



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

July 6, 2005

Reply To
Attn Of: ETPA-088

Ref: 04-050-AFS

Robbert G. Mickelsen
District Ranger
P.O. Box 46
Dubois, Idaho 83423

Dear Mr. Mickelsen:

The U.S. Environmental Protection Agency (EPA) has reviewed the final Environmental Impact Statement (FEIS) for the **Porcupine East, 9 Allotment Grazing Analysis** (CEQ No. 20050273), Caribou-Targhee National Forest, in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions.

The FEIS identifies Alternative 2, continued grazing with mitigation, as the agency's Preferred Alternative. Our main concerns on the draft EIS were regarding the limited range of alternatives, impaired water quality in the project area, source water protection, and inadequate or inconsistent information provided in the document.

We continue to have concerns over the limited range of alternatives as well as potential impacts to impaired streams in the project area. However, we support the key features of Preferred Alternative which includes minimizing impacts to listed streams in East Threemile and Middle Threemile Creeks by improving upland water developments, reducing impacts to Lower Spring Creek by allowing sheep to water only in designated areas, avoiding areas of soil disturbance in Ching and Moose Creek, and increasing the stubble height indicator to 5 inches. We continue to support the decision to manage the allotments to ensure standards and guidelines are met and that Allotment Management Plans can be amended to respond to the need to further improve range conditions. We continue to recommend that a comprehensive monitoring plan be developed and information collected during monitoring be used to determine whether or not aquatic habitat health necessitates resting. And we support requiring resting by the Forest Service Officer if the need arises as stated in the Response to Comments on page 5.19.

We would like to reiterate the importance of participating in the process of developing

and implementing Total Maximum Daily Loads (TMDLS) and if necessary modifying permits to be consistent with the load allocations. The FEIS Response to Comments states that “Draft Subbasin Assessments and TMDLs for this project area were completed this winter and will be finalized soon.” However, the Response to Comments did not indicate how this information will be used to direct management or influence permit conditions, but rather it stated that the development of TMDLs is outside of the scope of this project. We understand that it is the responsibility of the Idaho Department of Environmental Quality (IDEQ) to develop TMDLs and we recommend that the Forest Service coordinate with IDEQ and implement conditions in order to support the load allocation targets.

EPA had concerns with the lack of information regarding source water protection in the draft EIS. We thank you for your response and we were glad to see that the FEIS identified no source water protection areas in the project boundary.

Thank you for the opportunity to comment on the FEIS. Please feel free to contact Lynne McWhorter at (206) 553-0205 with any question that you have.

Sincerely,

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Christine Reichgott, Manager
NEPA Review Unit